

1 MICHAEL C. MILLS, ESQ.  
2 Nevada Bar No. 003534  
3 BAUMAN LOEWE WITT & MAXWELL  
4 3650 N. Rancho Dr., Ste. 114  
5 Las Vegas, Nevada 89130  
Phone: 702-240-6060  
Fax: 702-240-4267  
mmills@blwmlawfirm.com

6 Attorneys for Defendants  
7 Michael Williamson and FirstFleet, Inc.

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

BARBARA MORIN, an individual,

CASE NO: 2:22-cv-00583-JAD-NJK

Plaintiff.

vs.

MICHAEL WILLIAMSON, an individual;  
FIRSTFLEET, INC., a foreign corporation;  
DOE INDIVIDUALS I-X, inclusive; and  
ROE CORPORATIONS I-X, inclusive.

## Defendants.

ORDER TO MODIFY THE DISCOVERY PLAN AND  
SCHEDULING ORDER TO EXTEND DISCOVERY PLAN DEADLINES  
(THIRD REQUEST)

Plaintiff Barbara Morin and Defendants FirstFleet, Inc. and Michael Williamson, by and through their respective counsel, and pursuant to Local Rule 26-4, and via this Second Request stipulate to modify their discovery plan as follows:

1. Plaintiff filed her Complaint on February 22, 2022 in the Eighth Judicial District Court, Clark County, Nevada.

2. Defendants answered on March 28, 2022.

3. Defendants removed the matter to this court on April 6, 2022.

**STIPULATION AND ORDER TO MODIFY THE DISCOVERY PLAN AND SCHEDULING ORDER TO EXTEND  
DISCOVERY DEADLINES (THIRD REQUEST)**

1       4.     Counsel for the parties conducted a Fed. R. Civ. P. 26(f) conference on  
2 April 28, 2022. The parties submitted their Joint Discovery Plan and Scheduling Order  
3 to the Court on May 5, 2022. The Court denied the parties' request for Special  
4 Scheduling Review. [ECF 7]

5       5.       The parties prepared and filed a Stipulation and Order to Modify the  
6       Discovery Plan and Scheduling Order (Second Request) on July 19, 2022. The Court  
7       granted the Stipulation and Order. [ECF 21].

8	Discovery Cut-Off:	11/28/2022
9	Last Day to Amend Pleadings:	08/29/2022
10	Expert Disclosure Deadline:	09/26/2022
11	Rebuttal Expert Disclosure:	10/28/2022
12	Dispositive Motions Deadline:	12/27/2022
13	Pre-Trial Order:	01/30/2023

14 The second amended discovery plan was approved by United States Magistrate  
15 Judge Nancy J. Koppe on 07/20/2022.

16       6.     In compliance with Local Rule 26-4, the parties provide the following  
17 information regarding the discovery status:

(a) Discovery Completed pursuant to Fed. R. Civ. P. 26(a):

19 | Defendants:

20	Defendants' Initial Disclosures	05/11/2022
21	Defendants' Requests for Production of Document	05/03/2022
22	Defendants' Interrogatories	05/03/2022
23	Defendants' Order submitted to medical providers via	
24	authorization provided by Plaintiff's attorney	05/17/2022
25	Defendants' First supplement Disclosures	06/07/2022
26	Defendants' Second Supplement Disclosures	06/15/2022
27	Defendants' Third Supplement Disclosures	06/23/2022

**STIPULATION AND ORDER TO MODIFY THE DISCOVERY PLAN AND SCHEDULING ORDER TO EXTEND  
DISCOVERY DEADLINES (THIRD REQUEST)**

1	Defendants' Fourth Supplement Disclosures	07/12/2022
2	Defendants' First Supplement Requests for	
3	Production of Documents	07/18/2022
4	Defendants' Fifth Supplement Disclosures	08/05/2022
5	Defendants' Sixth Supplement Disclosures	09/02/2022
6	Defendants' Seventh Supplement Disclosures	09/13/2022
7	Defendants' Eighth Supplement Disclosures	09/19/2022
8	Defendants' Ninth Supplement Disclosures	09/26/2022
9	Defendants' Tenth Supplement Disclosures	10/07/2022
10	Defendants' Eleventh Supplement Disclosures	10/27/2022
11	Defendants' Twelfth Supplement Disclosures	11/09/2022
12	Defendants' Thirteenth Supplement Disclosures	11/21/2022
13	Defendants' Fourteenth Supplement Disclosures	11/28/2022
14	Defendants' Fifteenth Supplement Disclosures	01/04/2023
15	Defendants' Sixteenth Supplement Disclosures	01/13/2023
16	Defendants' Seventeenth Supplement Disclosures	01/27/2023

17 **Plaintiffs:**

18	Plaintiff's Initial Disclosures	05/19/2022
19	Plaintiff's First Supplement Disclosures	05/31/2022
20	Plaintiff Responded to Requests for Production	
21	of Documents	06/10/2022
22	Plaintiff Answered Interrogatories`	06/10/2022
23	Plaintiff's Second Supplement Disclosures	06/17/2022
24	Plaintiff attended her Independent Medical Examination	07/08/2022
25	Plaintiff's Third Supplement Disclosures	08/22/2022
26	Plaintiff First Supplemental Responses to Requests for	
27	Production of Documents	08/23/2022

28 STIPULATION AND ORDER TO MODIFY THE DISCOVERY PLAN AND SCHEDULING ORDER TO EXTEND  
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1	Plaintiff First Supplement Answers to Interrogatories	08/29/2022
2	Plaintiff's Fourth Supplement Disclosures	09/23/2022
3	Plaintiff's Fifth Supplement Disclosures	11/02/2022
4	Plaintiff's Sixth Supplement Disclosures	11/07/2022
5	Plaintiff's Seventh Supplement Disclosures	11/18/2022
6	Plaintiff's Eighth Supplement Disclosures	11/28/2022
7	Plaintiff's Ninth Supplement Disclosures	12/21/2022
8	Plaintiff's Tenth Supplement Disclosures	01/23/2023
9	Plaintiff's Eleventh Supplement Disclosures	01/27/2023

**(b) Discovery that remains to be completed:**

11 | None.

**(c) Reasons why discovery was not completed:**

13 The parties participated in a private mediation on January 24, 2023. The parties  
14 are still considering the mediator's proposal.

**(d) Proposed Schedule:**

16 The parties propose a 30 day extension to submit the Pre-Trial Order. The  
17 parties recently mediated this case but were unsuccessful in resolving the matter. The  
18 parties did not want to spend the time preparing this order if the matter was going to  
19 settle. Now that there is no settlement, the parties are intent of preparing for trial. The  
20 proposed extended dates will be:

21 || Discovery Cut-Off: CLOSED

22 | Last Day to Amend Pleadings: **CLOSED**

23 | Expert Disclosure Deadline: **CLOSED**

24 Rebuttal Expert Disclosure: CLOSED

25 Dispositive Motions Deadline: CLOSED

26 | Pre-Trial Order: 03/01/2023

27 (If dispositive motions are filed, the deadline for the filing of the joint pre-trial order will be

**STIPULATION AND ORDER TO MODIFY THE DISCOVERY PLAN AND SCHEDULING ORDER TO EXTEND  
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1 suspended until 30 days after decision on the dispositive motions or further court order.)

2 **CONCLUSION**

3 For the foregoing reasons, the parties herein respectfully request this Honorable  
4 Court to modify the Discovery Plan and Scheduling Order to extend all discovery  
5 deadlines.

6 Approved as to form and content:

7 Dated this 30<sup>th</sup> day of January, 2023

Dated this 30<sup>th</sup> day of January, 2023

8 THE POWELL LAW FIRM

BAUMAN LOEWE WITT & MAXWELL

9 /s/ *Ryan O'Malley*

/s/ *Michael C. Mills*

10 PAUL D. POWELL, ESQ.  
11 Nevada Bar No. 7488  
12 RYAN T. O'MALLEY, ESQ.  
13 Nevada Bar No. 12461  
14 The Powell Law Firm  
15 8918 Spanish Ridge Ave., Ste. 100  
16 Las Vegas, NV 89148  
17 Attorneys for Plaintiff,  
18 Barbara Morin

19 MICHAEL C. MILLS, ESQ.  
20 Nevada Bar No. 003534  
21 3650 N. Rancho Dr., Ste. 114  
22 Las Vegas, NV 89130  
23 Phone: 702-240-6060  
24 Fax: 702-240-4267  
25 Attorneys for Defendants,  
26 Michael Williamson and FirstFleet, Inc.

17 **ORDER**

18 IT IS SO ORDERED.

19 DATED this 31st day of January, 2023.

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23   
24 UNITED STATES MAGISTRATE JUDGE  
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STIPULATION AND ORDER TO MODIFY THE DISCOVERY PLAN AND SCHEDULING ORDER TO EXTEND  
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